

13 February 1998
EPA's "Red Flag" Comments on
CALFED Water Quality Program Plan
(1/5/98 Draft; Received 2/4/98)

The comments below summarize EPA's primary, "main issue" comments on the draft Water Quality Program Plan. We are mailing to you our marked up copy of the Program Plan which provides a few more specific, editorial-type comments that we believe will help the flow of the report. This marked up copy also includes our comments summarized below.

Page iv - "Note to Reader" - This section need more text describing how this document will be used and the program refined in the future. Insert into beginning of third paragraph the two sentences from page 50 that read "The WQPP has been developed at the programmatic level of detail - much work remains to identify the specific projects, activities, management actions, and other implementation measures needed to achieve the desired improvements in water quality. During the next phase of the CALFED program, the water quality activities will be further developed, refined, and evaluated before any specific improvement methods are adopted."

Page vii - "San Joaquin River Region" - This document (and the ADEIS) should be clear what it means to include Tulare Lake basin in the San Joaquin River Region. As we understand it, Tulare Lake basin is being considered when evaluating impacts of the programs, but is not a region whose water quality problems are being directly addressed through CALFED's water quality program. The text in this section should be clarified as to how the Water Quality Program relates to the Tulare Lake basin.

Page viii, Page 5, and Page A-1 - We have suggested wording changes on these pages to convey that the list contained in Appendix A represents the mailing list for the Water Quality Technical Group, but is not actually a list of the active members of the group. There are several names on the list who do not participate in this group. As it would probably be difficult to compile an accurate list of the "active" members, we suggest the following changes:

- Page viii, "Water Quality Technical Group" - delete "218" in first sentence. Delete "members" and replace with "mailing list" in second sentence.
- Page 5, first sentence - insert "mailing list" after "WQTG"
- Page A-1- replace "Members" with "Mailing List" in Title of appendix and in first sentence.

Page xi - Geographic Scope Figure - the colors or patterns depicting the "SWP and CVP Service Areas", "Bay Region", and "Delta Region" needed further differentiation. In the current figure, it is impossible to distinguish between these three areas. We suggest the inclusion of an insert or "zoom in" of San Francisco Bay area so you can better depict the "Bay Region" and "SWP and CVP Service Areas".

Page 2, 2nd paragraph - The text in this paragraph needs to be rewritten to better convey that the Water Quality Program is in development and is not already complete and being implemented. Here is our rewrite: "To achieve this goal, CALFED ~~has is~~ developed and intends to ~~is~~ implementing a Water Quality Program. The purpose of this report is to describe the proposed Water Quality Program (in its current form) and detail the results of the Water Quality Program activities conducted during Phase II of the program..."

Page 3, end of first paragraph - This section discusses pre-feasibility activities which need to occur. Either in this section, or on page 8 (last paragraph), it would be appropriate to add brief discussion about the current use of Category III and early implementation funds to conduct pre-feasibility studies or pilot projects for specific water quality actions or problems.

Page 6, Second sentence - "*Clean* Water Caucus" should be "**Environmental** Water Caucus"

Page 9, Table 3 - There are three areas that should be checked to indicate that actions will occur in these regions. These are:

(1) Mine Drainage / Bay Region {South SF Bay is included on the 303(d) list as an impaired water body due to mining and other activities. The water quality action addressing mercury contamination in the estuary should address the mercury mines in the Almaden watershed that drains into South San Francisco Bay.}

(2) Urban and Industrial Runoff / Bay Region {Again, San Francisco Bay and several tributaries are included on the 303(d) list due to impairments from urban runoff.}

(3) Wastewater and Industrial Discharge / Sacramento River Region

Page 13, last entry under "Methods" - should also include Almaden Watershed (South San Francisco Bay) and Panoche Creek (San Joaquin Region) as among targeted areas to address mercury mine drainage. The Bay Region should also be added on page 51 to the sentence that reads "The second action is to reduce the toxic effects of mercury loadings to the Delta, Sacramento, and San Joaquin River regions."

Page 17, Action 2 under Wastewater and Industrial Discharges - delete "cost-effective" in action statement. All actions in the Water Quality Program will be evaluated for cost-effectiveness, consistent with the "be affordable" solution principle. It is inappropriate to include the words only in this particular action.

Page 23, Action 6 - replace "surface drainage" with "runoff" - the layperson is more familiar with the term agricultural runoff.

Page 27, Methods under Human Health Action 1 - Addressing sediment contamination in the estuary should be included as one of the methods to carry out this action.

Pages 38 - 48, Table 5 - An EPA staff member from our Standards and Permits Office is reviewing this table of Water Quality Parameters of Concern. We will forward his comments early next week.

Page 53 - The descriptions of "Agricultural Drainage and Runoff", "Water Treatment" and "Water Management" in a different format than the other categories. This bulleted format for these three sections conveys much less detail and information than the text format used for the other sections. These three sections should be rewritten to be consistent with the other sections (and to convey the same level of information).

Page A-4 - Gail Louis of EPA is not listed in this appendix. Does this mean that she is not on the distribution list to receive Water Quality Technical Group meeting notices? (This has been a problem in the past that we thought was remedied.)